

EXHIBIT 16

LIQUOR STORE DENSITY BY STATE



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METHODOLOGY

The following presents and compares the number and density of liquor stores in quota and non-quota states.

We examined each state's statutory code for information regarding state-mandated quotas to separate states into quota and non-quota, non-control categories.

We reviewed official reports, searchable licensing databases and various other sources available at each state's alcohol regulation board or equivalent entity.

We reviewed information made available in searchable database form by the United States Census.

The report is current through December 10, 2014.

EXECUTIVE SUMMARY

- In the United States, 18 states impose population-based limits, or quotas, on the number of retail liquor store licenses that may be issued.
- Quotas are designed to limit the number of liquor stores that may operate in a given state, and there exists a concern that repealing or increasing current quotas would result in a proliferation of new liquor stores.
- Fourteen states qualify as control states, retaining state-run monopolies over the retail of hard alcohol at the store level.
- Six control states also impose quotas at the state level.
- Eighteen states are neither control nor quota states.
- In non-quota, non-control states, the retail of hard alcohol may be licensed at the state level, but the state does not exercise a monopoly or limit the number of retailers.
- **On average, non-quota, non-control states contain 50 percent more liquor stores per capita than quota states.**

LIQUOR STORE DENSITY COMPARISON
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QUOTA STATE LIQUOR RETAIL DATA

State	Population	Quota Per Capita	Stores	Pop Per Store
Alaska	731,449	1/3000	101	7242
Arizona	6,553,255	varies locally	1466	4470
Arkansas	2,949,131	1/4000	318	9274
California	38,041,430	1/2500	13806	2755
Florida	19,317,568	1/7500	1367	14131
Indiana	6,537,334	1/3500	359	18210
Kentucky	4,380,415	1/2300	914	4793
Massachusetts	6,646,144	1/2000	1900	3498
Michigan	9,883,360	1/3000	1581	6251
Montana	1,005,141	1/1500	96	10470
New Jersey	8,864,590	1/3000	2260	3922
New Mexico	2,085,538	1/2000	95	21953
Ohio	11,544,225	varies locally	837	13792
Pennsylvania	12,763,536	1/3000	600	21273
South Dakota	833,354	1/1500	75	11111
Utah	2,855,287	1/4925	144	19828
Washington	6,897,012	1/1200	1400	4926
Wyoming	576,412	1/3000	100	5764
Average				10204

NON-QUOTA, NON-CONTROL STATE LIQUOR RETAILER DATA

State	Population	Stores	Pop per Store
Colorado	5,187,582	1236	4197
Connecticut	3,590,347	1820	1973
Delaware	917,092	361	2540
Georgia	9,919,945	843	11767
Illinois	12,875,255	1326	9710
Kansas	2,885,905	755	3822
Louisiana	4,601,893	Data unavailable	
Missouri	6,021,988	4634	1300
Nebraska	1,855,525	949	1955
Nevada	2,758,931	Data unavailable	
New York	19,570,261	2700	7248
North Dakota	699,628	91	7688
Oklahoma	3,814,820	675	5652
Rhode Island	1,050,292	216	4862
South Carolina	4,775,000	990	4823
Tennessee	6,456,243	572	11287
Texas	26,059,203	2476	10525
Wisconsin	5,726,398	2351	2436
Average			5737

COMPARISON OF QUOTA AND NON-QUOTA STATE AVERAGES

An analysis of data from state and federal government sources demonstrates that non-quota, non-control states contain approximately 50 percent more liquor stores per capita than quota states. In non-quota states, there is on average one store for every 5,737 people. In quota states, there is on average one store for every 10,204 people.

	Average Pop. per Store
Quota States	10,204
Non-Quota States	5,737